

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

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OCT 29 1992

MAIL BRANCH

In the matter of
Revision of Part 15 of the Rules
to harmonize the standards for digital
devices with international standards

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Notice of Proposed
Rulemaking; Request
for Comments
ET Docket No. 92-152

Comments
of

EMACO, a TUV Product Service Company
7562 Trade Street
San Diego, CA 92121

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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INTRODUCTION

EMACO, a TUV Product Service Company, hereby submits Comments in the above-captioned matter.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EMACO is an independent testing laboratory specializing in Electromagnetic Interference testing providing services to electronic manufacturers seeking to have their products approved for marketing on the domestic and international markets.

COMMENTS

EMACO endorses the comments submitted by AMADOR, our sister organization in TUV Product Service. A copy of the AMADOR submittal is attached.

Respectfully submitted,

A. H. Mills
A.H. Mills
General Manager
EMACO, INC.

enclosure

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to harmonize the standards for digital)	Notice of Proposed
devices with international standards)	Rulemaking; Request
		for Comments
		ET Docket No. 92-152

INTRODUCTION

AMADOR, a TUV Product Service company, hereby submits its Comments in the above-captioned matter.

AMADOR is an independent testing laboratory that specializes in Electromagnetic Interference testing and has four Open Area Test Sites registered with the Commission. AMADOR is active in both national and international testing and in the corresponding standards development.

COMMENTS

AMADOR applauds the Commission's effort to harmonize the FCC Part 15 standards with such well known international standards as CISPR 22.

AMADOR believes that it is possible to have one electromagnetic emission standard for each class of equipment that would be suitable for worldwide marketing. That is, one test on each type of equipment should allow the product to comply with all international regulations on electromagnetic emissions such that the product can be marketed anywhere in the world.

AMADOR recommends that the CISPR 22 Powerline conducted emission limits be adopted as presently published in the 1985 version of CISPR Recommendation 22. AMADOR further recommends that two conducted emission tests be performed; one with the unit running on 60 Hz power and the other with the unit running on 50 Hz power. The test with the 60 Hz unit would satisfy United States FCC criteria while the test on the 50 Hz unit would satisfy countries using that power distribution network.

AMADOR recommends that the CISPR 22 radiated emission limits (1985 version) be adopted from 30 to 1000 MHz and that above 1000 MHz the FCC Part 15 limits and test methods shall apply. AMADOR believes that only one radiated emission test is needed on a type test and that the unit can be run on 60 Hz for the radiated emission test and the results are directly transferable to the 50 Hz environment.

AMADOR recommends a 10-meter antenna distance for Class A (Commercial) equipment and a 3-meter antenna distance for Class B (Domestic) equipment.

AMADOR further notes that the Japanese VCCI organization has recently changed its test site regulations (October-1992) and that site registration for the VCCI will have to comply with the basic criteria found in ANSI C63.4-1991. The transition time for this change is basically three years ending on December 31, 1995. AMADOR urges the Commission to consider this date as the final transition date to CISPR 22 limits and regulations since this date is also the final date for full effectivity of the European Economic Community's EMC Directive.

Respectfully Submitted,



Daniel D Hoolihan
Chief Operating Officer
AMADOR - A TUV Product Service Company